

Aaron L. Agenbroad (State Bar No. 242613)  
alagenbroad@jonesday.com

JONES DAY  
555 California Street, 26th Floor  
San Francisco, CA 94104  
Telephone: (415) 626-3939  
Facsimile: (415) 875-5700

Attorneys for WASHINGTON GROUP  
INTERNATIONAL, INC., A DIVISION OF URS  
CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**IN RE: KATRINA CANAL BREACHES  
CONSOLIDATED LITIGATION**

**PERTAINS TO: MRGO**

**(PENDING IN THE UNITED STATES  
DISTRICT COURT FOR THE EASTERN  
DISTRICT OF LOUISIANA AS CIVIL  
ACTION NO. 05-4182 "K" (2) BEFORE  
HON. STANWOOD R. DUVAL, JR.),**

**Defendant.**

**Case No. MISC. NO. 08-CV-  
80007MISC (PJH)**

**DECLARATION OF AARON L.  
AGENBROAD IN SUPPORT OF  
STIPULATION AND [PROPOSED]  
ORDER CONSOLIDATING AND  
MOVING HEARINGS ON  
DISCOVERY MOTIONS**

Date: March 5, 2008  
Time: 10:00 a.m.  
Courtroom: G, 15<sup>th</sup> Floor  
Judge: Hon. Bernard Zimmerman

I, AARON L. AGENBROAD, declare as follows:

I am a member of the State Bar of California and am admitted to practice in this Court. I am one of the counsel of record for Washington Group International, Inc. in the above captioned matter. I make this declaration in support of the parties' Stipulation and [Proposed] Order Consolidating and Moving Hearings on Discovery Motions.

1. The Court has currently scheduled a hearing on the pending Discovery Motions (i.e. the January 22, 2008 MR-GO PSLC Motion to Quash WGII ILIT Subpoena and Contemporaneous Motion to Stay Production; and the February 5, 2008 WGII Cross-Motion to Compel UC-Berkeley to Comply with WGII ILIT Subpoena served in connection with MR-GO litigation) for  
Case No. CV-08-80007 MISC

DECLARATION ISO STIPULATION  
CONSOLIDATING HEARINGS ON  
DISCOVERY MOTIONS TO APRIL 16, 2008

1 March 5, 2008 at 10:00 a.m.

2 2. An additional, related discovery motion was filed on February 14, 2008 (MR-GO PSLC  
3 Motion to Quash WGII Bea Subpoena in Barge and Contemporaneous Motion to Stay Production)  
4 that will not be fully briefed by the March 5, 2008 hearing date.

5 3. An additional, related discovery motion was filed on February 28, 2008 (WGII Cross-  
6 Motion to Compel Bea to Comply with WGII Bea Subpoena served in connection with Barge  
7 litigation) and was noticed for hearing on April 16, 2008 at 10:00 a.m.

8 4. All of these motions are substantially related and the interests of efficiency and judicial  
9 economy warrant their consolidation into a single hearing.

10 5. There have been no prior time modifications involving these discovery motions.

11 6. The requested shortening of time will not affect any broader schedule for this matter.

12 I declare under penalty of perjury under the laws of the United States and the State of  
13 California that the foregoing is true and correct.

14 Executed on this 29th day of February, 2008 at San Francisco, California.

15  
16 /s/ - Aaron L. Agenbroad  
17 Aaron L. Agenbroad  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28